

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
v.)	Criminal No. 04-30046-MAP
)	
7) MARK MCCARTHY,)	
Defendant.)	

Government's Motion for Downward Departure Pursuant to
U.S.S.G. § 5K1.1

The United States of America, by and through its undersigned attorneys, hereby moves that the Court grant the defendant Mark McCarthy a downward departure from the sentencing guideline range established in the Presentence Report. As reasons therefore, the government states that the defendant provided substantial assistance in the investigation and prosecution of another individual who committed offenses against the United States.

Pursuant to U.S.S.G. § 5K1.1 the government moves that the Court reduce the defendant's sentencing range by 50% because of

the substantial assistance provided by the defendant.

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

By: /s/ Todd E. Newhouse
Todd E. Newhouse
Assistant U.S. Attorney

CERTIFICATE OF SERVICE

Hampden, ss.

Springfield, Massachusetts
March 3, 2008

I, Todd E. Newhouse, Assistant U.S. Attorney, do hereby
certify that I have served, by ECF, a copy of the foregoing, to
all counsel of record.

/s/ Todd E. Newhouse
TODD E. NEWHOUSE
Assistant U.S. Attorney